

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN THE MATTER OF**

**WALTER PEREZ PEREZ  
MARILYN BONILLA MUNIZ**

**DEBTOR**

\*  
\*  
\*  
\*  
\*  
\*

**CASE 09-00124 SEK**

**CHAPTER 13**

\*\*\*\*\*

**URGENT MOTION FOR  
AUTHORIZATION TO MODIFICATION OF MORTGAGE LOAN**

**TO THE HONORABLE COURT**

**COMES NOW** the debtor/s represented by the undersigned attorney and very respectfully prays and states as follows:

- 1) That in order to eliminate very heavy mortgage arrears included in the confirmed Chapter 13 Plan (almost \$ 27,000.00) and other matters the debtors entered in an agreement for Doral Bank to modified their mortgage loan.**
- 2) The bank has given to the debtors a preliminary letter of intention and calculations over the business and is requesting from them to obtain from the Court an order to continue the proceedings.(attached bank's letter)**
- 3) The modification of the debtors' mortgage loan if approved will not affect any party in interest and will permit the debtors to put their home's arrears up-to-date. The amount of arrears that could and would be eliminated from the provisions of any future post-petition Plan modification will honor the % corresponding to the Trustee's commission as if having been paid through the Plan.**

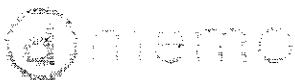
**WHEREFORE** the debtors very respectfully prays from the Court that in view of the representation made an order authorizing the debtors to continue and obtain a mortgage modification loan over their home be issue as soon as the Court deem appropriated.

**In Carolina Puerto Rico this 24 of August 2010**

**MORENO & MORENO LAW OFFICE**

**/s/RAFAEL MORENO GARCIA**  
**P.O. BOX 679-TRUJILLO ALTO**  
**P.R. 00977**  
**attorney USDC 202708**  
**Telephone 787-750-8160**  
**e-mail- moreno 97 @ prtc.net**

I HEREBY CERTIFY that on this same date copy of this motion has been forwarded by electronic filing to the Chapter 13 Trustee of the case , to the U.S. Trustee's office, and to the creditors or creditors counsel as per the CM/ECF SYSTEM and to other parties in interest and creditors not included in the electronic register by means of regular mail.



To: **Bufete Moreno & Moreno Law Office**

From: **Jose M. Rodriguez Feliciano**  
**Agente de Loss Mitigation**

Subject: **Casos: 50032208 a nombre Sr. Walter Perez Perez, Sra. Marilyn Bonilla Muñiz**

Date: 8/19/2010

*El día de hoy 19 de Agosto 2010 se presento el Sra. Marilyn Bonilla Muñiz se presento en nuestras oficinas buscando alternativas para su propiedad. El préstamo # 50032208 que mantienen con nuestra institución están acogida a la protección por Ley Quiebra. Como parte del procedimiento para establecer la alternativa se evaluó la situación financiera y se les explico que se pueden considerar como alternativa una modificación para su préstamo. A continuación los detalles discutidos con el cliente:*

- *Los términos originales como el tiempo de amortización e interés prevalecen de la misma forma.*
- **Número de cuenta 50032208**
- *Original loan - \$168,480.00*
- *Termino a 30 años*
- *Interés - 7.950%*
- *Pi - \$1,230.38*
- *Pago regular - \$1,320.89*
- **Los nuevos términos son los siguientes**
- *Principal balance- \$194,817.14*
- *Termino a 30 años*
- *Interés- 7.950%*
- *Pi - \$1,422.93*
- *Pago regular - \$1,513.44*
- **Exceso del nuevo balance o lo que se origino- \$26,367.14**

*Se le explico que para comenzar con el trámite de la modificación del préstamo, la cuenta debe estar fuera del plan de quiebra u obtener la autorización del Tribunal y someter los documentos de ingresos y gastos los números que le estamos informando es un pago aproximado. En adición esta aprobación está sujeta a que el inversionista de la aprobación.*

*Sin más en el particular queda de usted*

Jose M. Rodriguez  
Tel. (787) 474-6644  
Fax. (787) 474-6832  
Agent Loss Mitigation  
[Jcse.rodriguez@doralbank.com](mailto:Jcse.rodriguez@doralbank.com)

Jrf